



MANDEL BHANDARI LLP

11 Broadway | Suite 615 | New York, NY | 10004 | T. (212) 269-5600 | F. (646) 964-6667 | www.mandelbhandari.com

August 13, 2014

BY ECF

Hon. John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Scantibodies Laboratory, Inc., v. Church & Dwight Co., Inc.,
Case No.: 1:14-cv-02275 (JGK)

Dear Judge Koeltl:

We represent Plaintiff Scantibodies Laboratories Inc. ("SLI") in the above-captioned action against Defendant Church & Dwight ("C&D"). We consent to C&D's request to respond to SLI's Rule 37.2 letter dated August 12, 2014 (the "Letter") on or before August 20, 2014.

Prior to our submission of the Letter, the parties spent over 10 hours meeting and conferring about C&D's objections. Ultimately, on August 7, C&D advised SLI that it had made a final determination that it would not produce any of the information detailed in the Letter. The parties were scheduled to have yet another telephonic meet and confer at 11:45 am on August 12. Had that meet and confer occurred, SLI would have provided C&D with all of the information it sought concerning SLI's discovery responses. However, C&D cancelled the meet and confer and failed to respond to SLI's emails to reschedule the meet and confer.

In any event, C&D has now committed to complete the meet and confer process by the end of this week. Accordingly, SLI has no objection to C&D's request for an extension to respond to the Letter so that, in the event C&D raises any concerns about SLI's discovery responses, the Court can resolve the parties' concerns simultaneously.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "R. Bhandari", with a stylized flourish at the end.

Rishi Bhandari

Cc: Counsel for Defendant
(via ECF)